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VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

**Re: Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC
to Establish a Consolidated Informational Docket for Review and Consideration
of Grid Improvement Plans
Docket No. 2019-381-E**

Dear Ms. Boyd:

Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP," together with DEC, the "Companies" or "Duke Energy") filed a joint petition with the Public Service Commission of South Carolina (the "Commission") on December 16, 2019, requesting the establishment of a consolidated informational docket for review and consideration of the Companies' grid improvement plans (the "Petition"). On January 15, 2020, the Commission issued Order 2020-44 in the above-referenced docket directing interested stakeholders to provide comments regarding the Companies' Petition, a procedural schedule, as well the need for an intervention period.

In the Petition, the Companies requested the Commission establish a consolidated "NDI" docket for this matter to house exhibits and testimony previously provided in DEC's and DEP's most recent rate cases, as well as to report activities and notice allowable ex parte briefings, presentations and provide updates on stakeholder engagement work and other information.¹ The information provided in the docket will not create an official evidentiary record for use in a future rate proceeding, but rather will serve to expedite or narrow discovery in future proceedings. Duke Energy believes that the establishment of an informational NDI docket is an appropriate means for advancing stakeholder discussion of the Companies' plans and activities and to keep the Commission apprised of grid improvement activity as described more fully in the Companies' December 16, 2019 filing. Furthermore, as stated in its letter filed in this docket on January 23,

¹ Companies' Petition at Paragraph 9.

2020, the Office of Regulatory Staff ("ORS") supports the establishment of an NDI or administrative docket to allow the Companies, ORS, and any interested third parties, to file comments and information with the Commission as it becomes available.

The Commission also requested comments regarding a procedural schedule in this docket. The Companies do not believe that is necessary to establish a procedural schedule. Rather, the Companies believe it would be appropriate for the Commission to issue an order in this docket that an NDI docket be established and that notice be provided to customers. Given that the intent for the informational docket is for interested parties to utilize the docket as a means to obtain information regarding Duke Energy's Grid Improvement Plans until such time as DEC's or DEP's next general rate proceeding in which Grid Improvement Plan related costs may be considered for recovery, the Companies do not see the need for the establishment of a procedural schedule in this matter. Discovery in a rate case would not be precluded by the establishment of the requested NDI docket.

Finally, although Duke Energy does not object to Walmart's January 22, 2020 letter requesting that parties who were previously granted intervention in either Docket No. 2018-318-E or 2018-319-E be considered parties of record in this matter, the Companies assert that an intervention period is not necessary for the establishment of an NDI docket.

Sincerely,



Heather Shirley Smith

- C: Nanette Edwards, Office of Regulatory Staff (via email)
Dawn Hipp, Office of Regulatory Staff (via email)
Andrew Bateman, Office of Regulatory Staff (via email)
Jeffrey Nelson, Office of Regulatory Staff (via email)
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Bridget Lee, Sierra Club (via email)
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Carrie Grundmann, Walmart, Inc. (via email)
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James Blanding Holman, IV, SELC on behalf of SC NAACP, SCCCL
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Michael Lavanga, Nucor Steel – South Carolina (via email)
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Richard Whitt, SCSBA and Cypress Creek Renewables (via email)
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